

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE TRICOR DIRECT PURCHASER ANTITRUST LITIGATION)	C.A. No. 05-340 (KAJ)
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)	
THIS DOCUMENT RELATES TO:)	(consolidated)
)	
ALL ACTIONS)	
)	
IN RE TRICOR INDIRECT PURCHASER ANTITRUST LITIGATION)	C.A. No. 05-360 (KAJ)
)	
)	
THIS DOCUMENT RELATES TO:)	(consolidated)
)	
ALL ACTIONS)	
)	

JOINT STATUS REPORT

Pursuant to this Court's Scheduling Order dated October 27, 2005 (the "Scheduling Order"), C.A. No. 05-340 (D.I. 43); C.A. No. 05-260 (D.I. 47), Coordinated Direct Purchaser Plaintiffs, Indirect Purchaser Class Plaintiffs, and Indirect Purchaser Plaintiff Pacificare Health Systems, Inc. ("Pacificare"), (collectively "Plaintiffs"), and Defendants Abbott Laboratories ("Abbott"), Fournier Industrie et Sante, and Laboratories Fournier ("Fournier") (collectively, "Defendants"), by and through their counsel, hereby submit this Joint Status Report.

A. Discovery

1. Pursuant to the Scheduling Order, the deadline for completion of fact discovery was October 31, 2006. By stipulated order entered on November 7, 2006, the

Court extended the deadline to November 30, 2006 in order to allow additional time for certain specific written discovery responses and for completion of depositions noticed prior to the deadline. C.A. No. 05-340 (D.I. 293); C.A. No. 05-260 (D.I. 278).

2. As of this date, more than fifty depositions have been completed. By mutual agreement, certain depositions noticed prior to the October 31, 2006 discovery cut-off have been, or will be, scheduled after this date. The parties are working in good faith to complete all depositions in a timely manner, and do not expect any depositions conducted after October 31, 2006 to impact any other scheduled deadline.

3. As of this date, the parties have responded to all outstanding written discovery requests.

4. Pursuant to the Scheduling Order, the deadline for expert disclosures pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure is December 15, 2006. The parties have commenced disclosing potential experts as required by the Protective Order Governing Confidential Information. C.A. No. 05-340 (D.I. 94); C.A. No. 05-260 (D.I. 97).

B. Motion Practice

1. On August 16, 2006, Abbott and Fournier served answering briefs and supporting papers in opposition to Direct and Indirect Purchaser class plaintiffs' motions for class certification. C.A. No. 05-340 (D.I. 190); C.A. No. 05-260 (D.I. 211). Indirect and Direct Purchaser Plaintiffs filed their reply memoranda in support of their class certification motions on October 4, 2006. C.A. No. 05-340 (D.I. 249); C.A. No. 05-260 (D.I. 250). Both the Indirect and Direct Purchaser Plaintiffs have requested oral argument on these motions. C.A. No. 05-340 (D.I. 259); C.A. No. 05-260 (D.I. 256).

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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2006 I electronically filed the foregoing document using CM/ECF, which will send notification of such filing to all registered participants, including:

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